

**RECEIVED**

IN THE UNITED STATES DISTRICT COURT

SEP 22 2022

*YMA*  
PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Eastern DIVISION

Nikki Giovanni Bellamy)

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(Enter above the full name  
of the Plaintiff[s] in this  
action).

Case No.

4:22-CV-00115-1

(To be assigned  
by the Clerk of  
District Court)

vs.

East Carolina University,  
University of North Carolina System

Janice Lewis)

Mark Sanders)

William Gee)

(Enter above the full name of  
ALL Defendant[s] in this action.

Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of all the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

**COMPLAINT**

1. Plaintiff resides at 1401 E 10th St Apt 133  
Greenville NC 27858

2. Defendant(s) name(s): East Carolina University  
University of North Carolina System  
Janice Lewis  
Mark Sanders  
William Gee

Location of principal office(s) of the named defendant(s):

Greenville, NC, Raleigh, NC

Nature of defendant(s) business:

education

Approximate number of individuals employed by defendant:

East Carolina University - 5000 UNC System

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A)  Failure to employ me.
- (B)  Termination of my employment.
- (C)  Failure to promote me.
- (D)  Other acts as specified below:

5. Plaintiff is:

(A)  presently employed by the defendant.  
(B)  not presently employed by the defendant.

The dates of employment were \_\_\_\_\_.

Employment was terminated because:

(1)  plaintiff was discharged.  
(2)  plaintiff was laid off.  
(3)  plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A)  my race.  
(B)  my religion.  
(C)  my sex.  
(D)  my national origin.  
(E)  other as specified below:

disability

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Janice Lewis - Library Director  
Mark Sanders - Assistant Director of  
Access Services

William Gee Head of Circulation  
and Interlibrary Loan Services

8. The alleged discrimination occurred on or about 06-2018,  
October 2020 to 1-20-2021.

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

I was discriminated against. I was at the time the only minority in the Circulation department. During 2018 my supervisor William Bee yelled at me and told me if I was having cognitive issue I needed to go out on FMLA leave in front of several staff members and students. I was retaliated against while on FMLA leaving 2013 and 2018 subject to working against ~~and~~ accommodated ~~as~~ set for me in 2019. During the Pandemic 2020 to 2021 I was forced to work in condition even though I was high risk and the doctor stated this in ~~my~~ diet.

10. The alleged illegal activity took place at: East

Carolina University

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 07-19-2021. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 06-24-2022.

12. I seek the following relief:

(A)  recovery of back pay;  
(B)  reinstatement to my former job;  
(C)  trial by jury on all issues so triable;

and any other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

09-22-2022

Date

Signature of Plaintiff

*Yvonne Grami Bellamy*

1401 E 10th St

Greenville, NC 27858

252-751-3682 / 252-451-0318

Address and Phone Number of Plaintiff